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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Kathrine Renee Velasquez,
Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:23-cv-00367-SKO

STIPULATION AND UNOPPOSED
MOTION FOR EXTENSION OF
TIME; ORDER

(Doc. 15)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 4-day extension of time, from August 14, 2023 to August 18, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs

1 being due on the same week. For the weeks of August 14, 2023 and August 21,
2 2023, Counsel currently has 3 merit briefs, and several letter briefs and reply
3 briefs. Counsel requires additional time to brief the issues thoroughly for the
4 Court's consideration. Defendant does not oppose the requested extension.
5 Counsel apologizes to the Defendant and Court for any inconvenience this may
6 cause.

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8 Respectfully submitted,

9 Dated: May 24, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

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11 By: /s/ Jonathan Omar Pena
12 JONATHAN OMAR PENA
13 Attorneys for Plaintiff

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16 Dated: May 24, 2023

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation
Social Security Administration

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22 By: */s/ Jamala Edwards
23 Jamala Edwards
24 Special Assistant United States Attorney
25 Attorneys for Defendant
26 (*As authorized by email on May 24, 2023)
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ORDER

Pursuant to the parties' foregoing stipulation and unopposed motion for an extension of time (Doc. 15), IT IS HEREBY ORDERED that Plaintiff shall have an extension, up to and including August 18, 2023, to file Plaintiff's Motion for Summary Judgment. The deadlines in the Scheduling Order (Doc. 5) are hereby extended accordingly.

IT IS SO ORDERED.

Dated: August 15, 2023

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE